

I feel the NHTSA ought to make a distinction between legitimate, established engineering companies that have the capability, resources and facilities to design and produce better car lights, on the one hand, and the shell-game import houses that bring in noncomplying stuff for the kids who think it looks "cool" (clear taillights, blue headlight bulbs, black headlight and taillight covers, "Altezza" lights, and so forth).

It seems to me that within the field of noncomplying car parts, there's a much bigger safety threat from marketing companies like APC getting rich on dangerous junk made to no quality or performance standards in places like China and Taiwan, compared to the relatively small and primarily statutory "threat" to safety posed by established engineering-based companies' products that may be intended for other (EEC) markets. These latter products may not be built to the US specs, but at least they're usually built and tested to a scientifically rigorous, engineering based technical standard that's accepted throughout the world with the exception of North America.

This is not to suggest that the NHTSA should simply throw up its hands and say "We give up", but if your agency's enforcement budget is limited, as I suspect it probably is these days, it seems to me there's a bigger threat from a Chinese "piece of red plastic over a bulb that has pretty chrome shiny stuff on it" type equipment than there is from an EEC approved taillamp assembly.

Along this line, I am scratching my head over the relatively small amount of money that APC got fined for only some of their illegal equipment. \$650,000 seems like nothing to a company that does (by most estimates) over \$12,000,000 per year in business. I note APC is still alive and well and churning out "not just illegal in the US, but illegal all over the world" equipment. Wasn't the penalty supposed to stop this?

In sum, NHTSA ought to develop and adopt a set of regulations that acknowledges and permits the market for aftermarket automotive lighting components, requires them to meet the same performance specs as the original equipment they replace, and makes a distinction between properly-engineered equipment that's not for this market, and improperly engineered "toy" products. The current 2-category system of "legal" vs. "illegal" equipment seems not finely tuned enough. It seems to allow too much poor lighting and prohibit quite a bit of good lighting.

Thank you for having my comment.